



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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May 11, 2016

TO: Parties and Intervenors

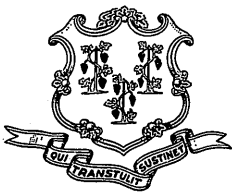
FROM: Melanie Bachman, Acting Executive Director *MB*

RE: **PETITION NO. 1224** – Woods Hill Solar, LLC petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction, maintenance and operation of a 17.61 Megawatt AC Solar Photovoltaic Electric Generating facility located at 90 and 101 Woods Hill Road, Pomfret, Connecticut.

Comments have been received from the Connecticut Department of Agriculture, dated May 9, 2016. A copy of the comments is attached for your review.

MB/CMW/laf

c: Council Members



STATE OF CONNECTICUT

DEPARTMENT OF AGRICULTURE
OFFICE OF THE COMMISSIONER

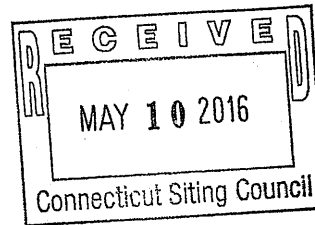


Steven K. Reviczky
Commissioner

Tel: (860) 713-2500
Fax: (860) 713-2514

May 9, 2016

Connecticut Siting Council
c/o Acting Executive Director Melanie Bachman
Ten Franklin Square
New Britain, CT 06051



Re: Petition No. 1224; RES Americas, Inc; Petition for Declaratory Ruling for Solar Energy Project on Woods Hill Road, Pomfret, Connecticut

Dear Acting Executive Director Bachman:

The Connecticut Department of Agriculture offers the following comments on this Project:

The proposed project seeks to convert approximately 102 acres of Prime and Important Farmland Soils to an approximately 20 megawatt solar voltaic development. Prime and Important Farmland soils are recognized federal and state significant natural resources that need to be considered when evaluating the effects of a proposed facility. Any expenditure of federal funds requires evaluation (Farmland Policy Protection Act), as well as State funds, if over 25 acres (C.G.S. 22-26aa). Impacts on Important Farmland soils should be listed as a requirement of all projects. We recommend revising the Council's Application Guides accordingly.

The affected parcels in the petition are currently in agricultural use for corn and hay production to support nearby farms. There is considerable competition for available agricultural land in Connecticut. The loss of 102 acres of highly productive farmland will have an adverse impact on one or more farms in the Woodstock-Pomfret area as they struggle to find similar quality and quantity of land to farm. The farms may end up accessing less productive land, land with more environmental risk, higher costs for production, or purchasing more expensive feed from elsewhere. These changes put their businesses at increased risk for failure.

The potential loss of Connecticut farms reduces Connecticut's efforts to increase our food security, results in the importation of human food and animal feed from out-of-state and out-of-country, increases our food miles, and thus increases our carbon footprint.

The Project's conversion of significant actively used agricultural land resources in Pomfret is largely incompatible with the goals of the State of Connecticut to keep agriculture viable and growing, permanently protect farmland from conversion through the purchase of agricultural easements and/or development rights, improve land use planning, and increase agriculturally based economic development and investment through grants and programs. Prime and Important Farmland soils are a finite resource. In addition to taking agricultural lands out of production in the near term, the development of solar facilities and the associated construction techniques and placement of other infrastructure will damage soil resources and have long term impacts on agricultural productivity should the solar lease end and the fields be available for agriculture in the future.

The Applicant's consultant, Tighe and Bond, minimizes the impacts of the installation of the solar array and infrastructure on the soil resource. The impacts of thousands of holes from the driven metal support posts, miles of trenching for electrical conduit, surface grading, and the construction of access roads and equipment pads are significant. These manipulations and changes will adversely impact the upper 24 inches of the soil which are critical to plant growth. The inversion of soil horizons, compaction, destruction of soil structure, and changes to surface and subsurface soil hydrology are likely, with negative consequences for agricultural productivity.

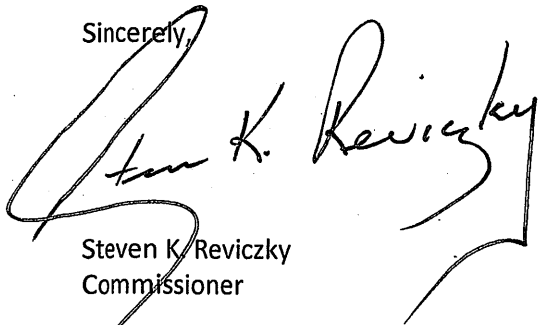
The Department of Agriculture strongly disagrees with Tighe and Bond's conclusion in Section 3 of the *Effects on the Environment Report* that the "Project is beneficial for farmland preservation". The loss of 102 acres of actively used Prime and Important Farmland soils from an agricultural community that has a deficit of arable land will put additional farms at risk for failure and conversion to nonagricultural use, including development. Should the Project at some future time be decommissioned and leave the property, the soil productivity will have been compromised and require restoration with unknown productivity for future farmers.

In conclusion, the Connecticut Department of Agriculture does not support this project, finds that there is substantial environmental impact, and does not support a Certificate of Environmental Compatibility. We do not recommend this project receive State of Connecticut funding assistance for its development since it is counterproductive with the State's goals of Farmland Protection, protection of Prime and Important Farmland soils, and the promotion of agricultural economic development.

The Department supports development of properly scaled renewable energy on farms and farmland so long as they are in concert with the Connecticut's farmland protection goals and policies and mindful of protecting the current and future agricultural utility of the land. At the same time, energy companies, policy makers and decision makers should be mindful that there are substantial highway right of ways, brownfield sites, developed sites and gravel mines in the Quinebaug Valley that are much better suited to solar development than the conversion of farms with significant natural resources including prime and important farmland soils.

Thank you for the opportunity to comment on this project. If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven K. Reviczky". The signature is stylized with a large, sweeping initial "S" and a long, horizontal stroke extending to the right.

Steven K. Reviczky
Commissioner

Cc: Commissioner Klee
Department of Energy and Environmental Protection